

TRAVIS COUNTY  
AUDITOR'S OFFICE

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COUNTY AUDITOR



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Date: March 2, 2020

From: Patti Smith, Travis County Auditor

To: Elected and Appointed Officials

Subj: Invoices with Personally Identifiable Information (PII) or Protected Health Information (PHI)

This memorandum formalizes and communicates our practices for compliance with the HIPAA Privacy Rule, privacy regulations, and County HIPAA policies and procedures.

Effective immediately, the Travis County Auditor's Office will not accept any invoices for payment that contain un-redacted Personally Identifiable Information (PII) or Protected Health Information (PHI). Such invoices will not be processed for payment and they will be permanently deleted from our files. For payment to be made, an invoice must be re-submitted. The re-submitted invoice must have all PII/PHI information redacted and appropriately disclosed.

For purposes of this policy,

PHI is defined as *"Individually identifiable health information that is transmitted or maintained in any form or medium (including electronic, oral, or paper) by a Covered Component or its Business Associate. Individually identifiable health information relates to the past, present or future physical or mental health condition of an individual; the care of the individual; or the past, present, or future payment for healthcare to an individual; and includes enough information to provide a reasonable basis to believe that the information could be used to identify the individual."*

PII is defined as *"Information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc."*

Please direct any questions you may have regarding this policy memorandum to the Auditor's Office Privacy Liaison, Donna Scarbrough, at 512-854-6666 or [donna.scarbrough@traviscountytexas.gov](mailto:donna.scarbrough@traviscountytexas.gov).

cc: Travis County Financial Liaisons